

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SURFACE ART, INC., a Washington
corporation,

Plaintiff,

v.

TESSARAE TECHNOLOGIES, LLC, a Georgia
domestic limited liability company; DAVID
DRISHPON, an individual and resident of
Georgia; ERPIZO, LLC, a Texas domestic limited
liability company; and DOES 1-50,

Defendants.

NO. 2:24-cv-00924-TL

**STIPULATED REQUEST AND
~~PROPOSED~~ ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

The Parties have met and conferred and jointly file this Stipulated Request and
[Proposed] Order to continue the deadline for Defendants to respond to Plaintiff's Complaint.¹

The Parties have previously automatically extended the deadline one (1) time, from the original
deadline of August 8, 2024 to August 23, 2024.

Over the past two (2) weeks, counsel for all Parties have been in active communication,
have identified and investigated a jurisdictional issue related to the citizenship of all of the
members of Tesserae Technologies, LLC to determine whether complete diversity exists.

¹ Pursuant to the Hon. Tana Lin's Standing Order For All Civil Cases, Section III(A.), the
parties do not submit this request as one for an automatic extension, as the response deadline
has been automatically extended one time. All other elements of Section III(A) are met.

1 With the foundational jurisdictional issue addressed, the Parties need additional time to
2 engage in a substantive meet and confer effort related to items identified in the Complaint by
3 counsel for Tessarae Technologies and David Drishpon. The timing of this effort has been
4 impacted by various pre-scheduled summer vacations of counsel and the parties.

5 Pursuant to Judge Lin's Standing Order for All Civil Cases, the Parties have agreed to
6 move the following deadline:

7 Defendants' Response to the Complaint is extended to September 6, 2024.

8 A [Proposed] Order extending the deadline is included below.

9 This request is (1) unopposed and agreed upon between the Parties; (2) the date has been
10 previously automatically extended one (1) time for a period of fifteen (15) days; and (3) such
11 request does not change the date for (a) any hearing, (b) any final submission to the Court
12 related to a hearing, (c) any dispositive motion or expert motion deadline, or (d) any deadline
13 after the filing of dispositive and expert motions in the trial scheduling order.

14 DATED this 22nd day of August, 2024.

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16 By /s/ Jason E. Fellner

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Attorneys for Erpizo, LLC

[PROPOSED] ORDER

The Parties' Stipulated Request to Extend the Defendants' Response to the Complaint is granted. The deadline for Defendants to respond to the Complaint is extended to September 6, 2024.

IT IS SO ORDERED.

DATED: August 23, 2024



HON. TANA LIN